

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ROBERT GUSTAVSEN et al.,)
Plaintiffs,)
v.) Civil Action No. 1:14-cv-11961-MLW
ALCON LABORATORIES, INC., et al,)
Defendants.)

UNOPPOSED MOTION FOR STIPULATED ORDER OF CONFIDENTIALITY

Pursuant to Fed. R. Civ. P., Rule 26(c), the parties, through their counsel, request that the Court enter the attached Stipulated Order of Confidentiality to govern the production, discovery and handling of confidential information and documents in this action as an order of the Court. This motion is being filed at this time because, in response to arguments by Defendants relating to their motion to dismiss, Plaintiffs intend to seek leave to submit certain documents obtained through discovery in another matter, as to which Defendants assert confidentiality.

Defendants intend to object to the submission of these documents. Nothing contained in this joint motion or the attached Stipulated Order of Confidentiality shall be deemed to waive Defendants' arguments or objections in opposition to any motion Plaintiffs file seeking leave to submit the discovery documents at issue.

Dated: December 17, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified in the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on December 17, 2015.

/s/ Richard S. Cornfeld
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